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IDAHO DEPARTMENT OF
HEALTH & WELFARE

DDA COMPLIANCE REVIEW

AGENCY NAME: DEVELOPMENTAL CONCEPTS INC

SURVEY DATE(s): 9/11/2007-9/19/2007

NOTE: This document contains a listing of findings made by the survey team. The summary of survey findings is based on the survey team's professional knowledge and interpretation of IDAPA requirements. In the Column, "Agency's Plan for Compliance", the statement should reflect the agency's plan for compliance action and anticipated time for plan to be implemented.

SURVEY TEAM MEMBERS: Rebecca Fadness, Program Supervisor; Cyndy Johnson, Clinician - Medicaid
Veronica Martinez, MSW - Region IV FACS; Linda Keirnes, M.Ed. Heather Olson, IBI Coordinator- Region IV FACS
Mike Breuer, Human Services Regional Program Specialist- Region III FACS

SURVEY FINDINGS

Participant/Family Satisfaction Survey: Parent/Participant Satisfaction surveys were very positive. Parents stated feeling very satisfied with the services received at Developmental Concepts; and that they have definitely noticed enormous improvements in their children's behaviors, functioning and living skills. Parents also stated that Developmental Concepts staff is very responsive, accommodating and flexible to their children's needs.

Therapy Observation Notes:

Therapist seemed to have an excellent rapport with the children. The interaction between the children and their therapist seem appropriate and positive. The therapist used cueing and reinforcement as instructed and this elicited positive response. The frequency of reinforcement was mostly verbal; however it seemed effective and the children seemed to respond positively. The setting where therapy was conducted was conducive to success and it seemed to facilitate compliance and participation from the children during the session. During therapy, children were given breaks which also seemed to facilitate engagement and increase motivation to continue working.

Deficiencies:

Agency's Plan for Compliance:

IDAPA 16.04.11.510.04.Incident Reports. Each DDA must complete incident reports for all accidents, injuries, or other events that endanger a participant. Each report must document that the adult participant's legal guardian, if he has one, or, in the case of a minor, the minor's parent or legal guardian, has been notified or that the participant's care provider has been notified if the participant or the participant's parent or legal guardian has given the agency permission to do so. A documented review of all incident reports must be completed at least

1. What corrective action(s) will be taken? Participant #5 is her own guardian therefore it would be inappropriate for anyone else to see the reports. Additionally the form already has a section on it that states if the parent or guardian was notified.
2. How will the agency identify participants who may be affected by the deficiency(s). If participants are identified

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annually with written recommendations. These reports must be retained by the agency for five (5) years.

FINDINGS: Based upon record review and interview with Administrator, the agency is not in compliance. The findings included:

- Participant #5 had a Incident report completed that did not have documentation to support that the legal guardian or parent were notified. Further review found that the form did not have a line for parent/guardian notification or signature.
- An incident report for Participant #2 was found in file that met criteria for requiring parents to be notified. Section on report indicating date report sent to family was blank. No evidence found that parents were provided this information. Participant #4 had several Incident Reports in file that met criteria for notifying parents, however no evidence that family had been informed.

what corrective action will be taken? Participant #5 is her own guardian therefore it would be inappropriate for anyone else to see the reports. Developmental Concepts, Inc. will continue to review all of the reports in the monthly QA meeting to ensure that this component is met.

3. Who will be responsible for implementing each corrective action? When applicable Developmental Concepts, Inc. will correct these reports. Developmental Concepts, Inc. Developmental Disability Professionals and trainers will be responsible.
4. How the corrective action(s) will be monitored to ensure consistent compliance with IDAPA Rules? All applicable reports are sent to the parent or guardian when there is a guardian or parent in the case of a minor.
5. Dates of when the corrective action will be completed? November 2007.

1. What corrective action(s) will be taken? ALL reports will be sent to the parent or guardian as it not clear in Rule and only leaves room for interpretation of such "criteria".
2. How will the agency identify participants who may be affected by the deficiency(s). If participants are identified what corrective action will be taken? ALL reports will be sent to the parent or guardian as it not clear in Rule and only leaves room for interpretation of such "criteria". Developmental Concepts, Inc. will continue to hold monthly QA meetings in which all of the professionals meet and review all reports. This will include ensuring that the reports were sent to the parent or legal guardian.

3. Who will be responsible for implementing each corrective action? Administrator and Professionals of Developmental Concepts, Inc.
4. How the corrective action(s) will be monitored to ensure consistent compliance with IDAPA Rules? Developmental Concepts, Inc. will continue to review this component in our monthly reports/QA meeting.
5. Dates of when the corrective action will be completed? November 2007.

1. What corrective action(s) will be taken? We have already taken all the necessary steps to ensure that Developmental Concepts, Inc. remains in compliance. Developmental Concepts, Inc. has reviewed the eligibility for all of the

IDAPA 16.04.11.701.01 Eligibility Determination. Prior to the delivery of any DDA services, the DDA must determine and document the participant's eligibility in accordance with Section 86-402, Idaho Code. For eligibility determination, the following assessments must be obtained or completed by the DDA:

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FINDINGS: Based upon record review and interview with professional staff, the agency is not in compliance. The findings included:

- Eligibility for Participants 1-4, 8-11 was not done correctly and lacked documentation to determine eligibility correctly

participants that we serve. We have completed the Developmental Disabilities Eligibility Checklist Summary, and the SIB-r Checklist form on all participants. We have implemented a new training manual to cover all of the steps involved in eligibility. We have also had several conversations and emails with the Department of Health & Welfare to ensure that we are following all of the steps involved.

2. How will the agency identify participants who may be affected by the deficiency(s). If participants are identified what corrective action will be taken? Participants #1-4 and #8-11 have been addressed and all documentation is present for eligibility. Developmental Concepts, Inc. has reviewed all of the participants that we serve and ensured their eligibility through the steps outlined in answer #1 and we have invited staff from the Department of Health & Welfare to come in and review our findings with us.
3. Who will be responsible for implementing each corrective action? Developmental Concepts, Inc. Administrator and Developmental Therapy Supervisors.
4. How the corrective action(s) will be monitored to ensure consistent compliance with IDAPA Rules? Administrator has reviewed eligibility protocol with all staff to ensure that everyone is following the correct steps.
5. Dates of when the corrective action will be completed? November 2007.

16.04.11.601.03. Psychological Assessment. A current psychological assessment must be completed or obtained: (7-1-06) a. When the participant is receiving a behavior modifying drug(s); (7-1-06) b. Prior to the initiation of restrictive interventions to modify inappropriate behavior(s); (7-1-06) c. Prior to the initiation of supportive counseling; (3-30-07) d. When it is necessary to determine eligibility for services or establish a diagnosis; (7-1-06) e. When a participant has been diagnosed with mental illness; or (7-1-06) f. When a child has been identified to have a severe emotional disturbance.

Also refer to 604.09. Psychological Assessment. A psychological assessment includes psychological testing for diagnosis and assessment of personality, psychopathology, emotionality, or intellectual abilities (IQ test). The assessment must include a narrative report. Psychological assessment encompasses psychological testing and the psychiatric diagnostic interview.

FINDINGS: Based upon record review and interview with Administrator, the agency is not in compliance. The findings included:

1. What corrective action(s) will be taken? A full scale Psych eval has been conducted.
2. Who may be affected by the deficiency(s). If participants are identified what corrective action will be taken? This participant will not be affected as his IBI therapy will remain in place at least until his annual plan and Developmental Concepts, Inc. has the documentation and the approval from the Department of Health and Welfare approving these services. Developmental Concepts, Inc. will ensure that all participants that need a psychological eval will receive one before starting services. Developmental Concepts, Inc. will review all current files to ensure that psych evals are present when applicable.
3. Who will be responsible for implementing each corrective action? Developmental Concepts, Inc. developmental therapy/IBI team.

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- Participant #1 requires a current psychological test to be on file. Assessment in file is dated 10/23/01. A Progress Note describing the assessment is in file and dated 12/20/06, however this is insufficient.
- Participant #5 did not have a psychological assessment on file. The documentation submitted to support this rule are medication follow-up evaluations and is not a comprehensive psychological assessment.

4. How the corrective action(s) will be monitored to ensure consistent compliance with IDAPA Rules? Developmental Concepts, Inc. will remain in compliance with Rule by continuing to obtain all necessary psych evals and assessments. Developmental Concepts, Inc. has implemented a new training manual that all professionals have signed off on and will adhere to. Administrator and professionals will continue to review all documentation necessary before beginning services. This will be monitored through the QA Process in which a current Psych eval is listed on the log.

5. Dates of when the corrective action will be completed? November 2007.

1. What corrective action(s) will be taken? Full Psych eval has been obtained and shown to the Department of Health and Welfare for review.

2. How will the agency identify participants who may be affected by the deficiency(s). If participants are identified what corrective action will be taken? Developmental Concepts, Inc. will ensure that we have a psychological assessment has been obtained for all participants that require one under Rule. Developmental Concepts, Inc. will review all current files to ensure that psych evals are present when applicable.

3. Who will be responsible for implementing each corrective action? Administrator and DT/IBI team.

4. How the corrective action(s) will be monitored to ensure consistent compliance with IDAPA Rules? Developmental Concepts, Inc. will remain in compliance with Rule by obtaining all necessary psych evals and assessments. This will be monitored through the QA Process in which a current Psych Evaluation is listed on the log.

5. Dates of when the corrective action will be completed? November 2007.

1. What corrective action(s) will be taken? Developmental Concepts, Inc. has taken the unclear recommendations of the survey team and implemented a system that will account for the type of service, no range of hours and the frequency. This is in the training manual and will be clear in the documentation. The corrective action will be that we will ensure that there is a frequency specified and a specific

IDAPA 16.04.11.701.04. Individual Program Plan (IPP) Definitions. The delivery of each service on a plan of service must be defined in terms of the type, amount, frequency, and duration of the service. (7-1-06) a. Type of service refers to the kind of service described in terms of: (7-1-06) i. Discipline; (7-1-06) ii. Group, individual, or family; and (7-1-06) iii. Whether the service is home, community, or center-based. (7-1-06) b. Amount of service is the total number of service hours during a specified period of time. This is typically indicated in hours

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per week. (7-1-06) c. Frequency of service is the number of times service is offered during a week or month. (7-1-06) d. Duration of service is the length of time. This is typically the length of the plan year. For ongoing services, the duration is one (1) year; services that end prior to the end of the plan year must have a specified end date.

FINDINGS: Based upon record review and interview with Administrator, the agency is not in compliance. The findings included:

- Participant #1 & 4's IPP did not indicate type of service, provided a range of hours to be provided instead of an amount. Participant #3 & 4 was missing frequency.
- For Participants 8,9,10,11, the number of times services was offered to participants during a week or month was recorded in ranges of time and not a specifically exact amount of therapy.

IDAPA 16.04.11.701.05.d.xi. A transition plan. The transition plan is designed to facilitate the participant's independence, personal goals, and interests. The transition plan must specify criteria for participant transition into less restrictive, more integrated settings. These settings may include integrated classrooms, community-based organizations and activities, vocational training, supported or independent employment, volunteer opportunities, or other less restrictive settings. The implementation of some components of the plan may necessitate decreased hours of service or discontinuation of services from a DDA.

FINDINGS: Based upon record review and interview with Administrator, the agency is not in compliance. The findings included:

- Participants 1-4 transition plans were the same, lacking individuality, and did not describe criteria for transition into less restrictive environment.

amount of therapy listed.

- How will the agency identify participants who may be affected by the deficiency(s). If participants are identified what corrective action will be taken? Again Developmental Concepts, Inc. has implemented a new system in which we will identify the hours specific to the time of year per participant while still continuing to meet the needs, wants and desires of the participant and the families.
- Who will be responsible for implementing each corrective action? Administrator and Developmental Concepts, Inc. therapy professionals.
- How the corrective action(s) will be monitored to ensure consistent compliance with IDAPA Rules? Developmental Concepts, Inc. will ensure that these new details are implemented into every step and will have necessary documentation to support such needs. This will be monitored through the QA Process that will incorporate the frequency, type of service and amount of hours. Developmental Concepts, Inc. will review all files to evaluate who requires a more specific amount of time and will document that this will be completed per the participants annual plan.
- Dates of when the corrective action will be completed? November 2007.

- What corrective action(s) will be taken? Developmental Concepts, Inc. will provide more individuality to the transitions plan and ensure that they meet the criteria into a less restrictive environment when applicable. Developmental Concepts, Inc. did correct the transition plans and has increased the individuality in all new and annual plans.
- How will the agency identify participants who may be affected by the deficiency(s). If participants are identified what corrective action will be taken? Developmental Concepts, Inc. has already addressed participants #1-4 and made any necessary changes to these participants' transition plans. Developmental Concepts, Inc. did correct the transition plans and has increased the individuality in all new and annual plans.
- Who will be responsible for implementing each corrective action? Administrator and Developmental Concepts, Inc. therapy professionals.

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	<p>4. How the corrective action(s) will be monitored to ensure consistent compliance with IDAPA Rules? Developmental Concepts, Inc. Administrator and Therapy Professionals will continue to complete Quality Assurance reviews on transition plans so that we remain in compliance with the Rule. The QA review of the transition plans will be comprehensive and review the component of having the plans be as specific as possible for each participant.</p> <p>5. Dates of when the corrective action will be completed? November 2007.</p>
<p>IDAPA 16.04.11.701.05.a The IPP must be developed following obtainment or completion of all applicable assessments consistent with the requirements of this chapter.</p> <p>FINDINGS: Based upon record review and interview with Administrator, the agency is not in compliance. The findings included:</p> <ul style="list-style-type: none"> Participant #2's IPP was dated 3/9/07, the Medical/Social History was completed after that date on 3/15/07. In three of the four files reviewed (8-11), the developmental assessments for participants receiving DT were completed after the IPP was developed. 	<p>1. What corrective action(s) will be taken? Developmental Concepts, Inc. will complete the IPP after all assessments have been completed.</p> <p>2. How will the agency identify participants who may be affected by the deficiency(s). If participants are identified what corrective action will be taken? Developmental Concepts, Inc. has corrected the process and will adhere to the systematic way that the Rules are interpreted. Developmental Concepts, Inc. will ensure that all evals are completed before the IPP and this will be done through the professional training manual and QA.</p> <p>3. Who will be responsible for implementing each corrective action? Administrator and Developmental Concepts, Inc. therapy professionals.</p> <p>4. How the corrective action(s) will be monitored to ensure consistent compliance with IDAPA Rules? Developmental Concepts, Inc. has put into place a new system of procedures that outlines steps to ensure that we are meeting this Rule.</p> <p>5. Dates of when the corrective action will be completed? November 2007.</p>
<p>IDAPA 16.04.11.701.05. b. The planning process must include the participant and his parent or legal guardian, if applicable, and others the participant or his parent or legal guardian chooses. The participant's parent or legal guardian must sign the IPP indicating their participation in its development. The parent or legal guardian must be provided a copy of the completed IPP. If the participant and his parent or legal guardian are unable to participate, the reason must be documented in the participant's record. A physician or other practitioner of the healing arts and the parent or legal guardian must sign the IPP prior to initiation of any services identified within the plan, except as provided under Subsection 700.02.b.ii. of these rules. (7-1-06)</p>	<p>1. What corrective action(s) will be taken? Developmental Concepts, Inc. is aware that this error occurred and will ensure that the IPP is signed before delivery of services.</p> <p>2. How will the agency identify participants who may be affected by the deficiency(s). If participants are identified what corrective action will be taken? Developmental Concepts, Inc. will wait for the parent or legal guardian's signature no matter what has been requested. Developmental Concepts, Inc. will ensure that this does not occur again through training and QA.</p> <p>3. Who will be responsible for implementing each corrective</p>

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FINDINGS: Based upon record review, the agency is not in compliance. The findings included:

- In one of the four files reviewed (#9-11), the IPP was not signed by the parent prior to the delivery of therapy services.

IDAPA 16.04.11.701.05.e. The IPP must promote self-sufficiency, the participant's choice in program objectives and activities, encourage the participant's participation and inclusion in the community, and contain objectives that are age-appropriate. The IPP must include: (7-1-06)
ii. The name of the assigned Developmental Specialist, the date of the planning meeting, and the name and titles of those present at the meeting; (7-1-06)

FINDINGS: Based upon record review, the agency is not in compliance. The findings included:

- In one of the four files reviewed (8,9,10,11), the IPP cover sheet failed to include the names and titles of individuals present at the team meeting.

IDAPA 16.04.11.701.05.e. iv. The type, amount, frequency and duration of therapy to be provided. For developmental therapy, the total hours of services provided cannot exceed the amount recommended on the plan. The amount and frequency of the type of therapy must not deviate from the IPP more than twenty percent (20%) over a period of a four (4) weeks, unless there is documentation of a participant-based reason; (7-1-06)

FINDINGS: Based upon record review, the agency is not in compliance. The findings included

- In two of the four files reviewed (8,9,10,11), the amount and frequency of the therapy provided was not concurrent with the amount of therapy specified on IPP. The amount of therapy billed per week averaged at a higher deviation rate than the twenty percent 20% specified.

action? Administrator and Developmental Concepts, Inc. therapy professionals.

- How the corrective action(s) will be monitored to ensure consistent compliance with IDAPA Rules? Developmental Concepts, Inc. will ensure that all signatures are on the plan before beginning services without room for extenuating circumstances.
- Dates of when the corrective action will be completed? November 2007.

- What corrective action(s) will be taken? Developmental Concepts, Inc will ensure that all people present at the meeting will be written in with their name and title with the date of the planning meeting on the form.
- How will the agency identify participants who may be affected by the deficiency(s). If participants are identified what corrective action will be taken? Developmental Concepts, Inc. will ensure that all names are written in. Developmental Concepts, Inc. has reviewed the files to ensure that there are no other names missing.
- Who will be responsible for implementing each corrective action? Administrator and Developmental Concepts, Inc. therapy professionals.
- How the corrective action(s) will be monitored to ensure consistent compliance with IDAPA Rules? Developmental Concepts, Inc. will ensure that all names are written in through the professional training and QA.
- Dates of when the corrective action will be completed? November 2007.

- What corrective action(s) will be taken? The CSR's will accurately reflect the hours provided this has been addressed with the professionals and new system has been implemented. The corrective action is that new schedules will be put into place per the participants annual plan in which the professional will be able to track and identify the hours provided. If a 20% deviation occurs over a period of time then the Professional will hold a PCP meeting in which these hours will be discussed and new plan will be put into place if necessary.
- How will the agency identify participants who may be affected by the deficiency(s). If participants are identified what corrective action will be taken? The CSR's will accurately reflect the hours provided. The professionals

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	<p>have reviewed the CSR's to ensure their accuracy.</p> <ol style="list-style-type: none"> 3. Who will be responsible for implementing each corrective action? Administrator and Developmental Concepts, Inc. therapy professionals. 4. How the corrective action(s) will be monitored to ensure consistent compliance with IDAPA Rules? Administrator and Developmental Concepts, Inc. therapy professionals will ensure that the hours listed will match the hours provided per the review of the individual's schedule. 5. Dates of when the corrective action will be completed? November 2007.
<p>IDAPA 16.04.11.701.05.e xi. A transition plan. The transition plan is designed to facilitate the participant's independence, personal goals, and interests. The transition plan must specify criteria for participant transition into less restrictive, more integrated settings. These settings may include integrated classrooms, community-based organizations and activities, vocational training, supported or independent employment, volunteer</p> <p>FINDINGS: Based upon record review, the agency is not in compliance. The findings included:</p> <ul style="list-style-type: none"> In the four files reviewed (8,9,10,11), the transition plan did not specify how therapy would assist with transition to a less restrictive setting and to what the child will be experiencing in the near future. 	<ol style="list-style-type: none"> 1. What corrective action(s) will be taken? Developmental Concepts, Inc. will provide more individuality to the transitions plan and ensure that they meet the criteria into a less restrictive setting when applicable. Developmental Concepts, Inc. did correct the transition plans and has increased the individuality in all new and annual plans. 2. How will the agency identify participants who may be affected by the deficiency(s). If participants are identified what corrective action will be taken? Developmental Concepts, Inc. has already addressed participants #8-11 and made any necessary changes to these participants' transition plans. Developmental Concepts, Inc. did correct the transition plans and has increased the individuality in all new and annual plans. 3. Who will be responsible for implementing each corrective action? Administrator and Developmental Concepts, Inc. therapy professionals. 4. How the corrective action(s) will be monitored to ensure consistent compliance with IDAPA Rules? Developmental Concepts, Inc. Administrator and Therapy Professionals will continue to complete Quality Assurance reviews on transition plans so that we remain in compliance with the Rule. Developmental Concepts, Inc. has received clarification and will review all transition plans to ensure that the plan meets the criteria in Rule. 5. Dates of when the corrective action will be completed? November 2007.
<p>16.04.11.703. PROGRAM IMPLEMENTATION PLAN REQUIREMENTS.</p> <p>02. Baseline Statement. A baseline statement addressing the participant's skill level and abilities related to the specific skill to be learned. (7-1-06)</p>	<ol style="list-style-type: none"> 1. What corrective action(s) will be taken? Developmental Concepts, Inc. will ensure that the baseline statement accurately reflects the participant's need. We will continue to complete the Task Analysis Baseline Assessment to

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FINDINGS: Based upon record review, the agency is not in compliance. The findings included:

- In two of the four files reviewed, the baseline for children receiving DT seemed to be inaccurate because in many of the objectives the success rate for criteria was higher than the criteria set during the first month of therapy.

ensure that the baselines are accurately collected. The corrective action will be to implement a new system for the baseline assessment.

- How will the agency identify participants who may be affected by the deficiency(s). If participants are identified what corrective action will be taken? Developmental Concepts, Inc. will ensure that the baseline statement accurately reflects the participant's need. Developmental Concepts, Inc. will review all files and implement new baseline system at the annual plan. Developmental Concepts, Inc. will ensure that all participants have accurate baselines in accordance with their annual plans.
- Who will be responsible for implementing each corrective action? Administrator and Developmental Concepts, Inc. therapy professionals.
- How the corrective action(s) will be monitored to ensure consistent compliance with IDAPA Rules? Developmental Concepts, Inc. will complete the new baseline assessment so that Developmental Concepts, Inc. continues to provide accurate goals this will be completed by the Professionals and reviewed in a QA process.
- Dates of when the corrective action will be completed? November 2007.

IDAPA 16.04.11.703.04 Written Instructions to Staff. These instructions may include curriculum, interventions, task analyses, activity schedules, type and frequency of reinforcement and data collection including probe, directed at the achievement of each objective. These instructions must be individualized and revised as necessary to promote participant progress toward the stated objective.

FINDINGS: Based upon record review and interview with Administrator, the agency is not in compliance. The findings included:

- Individual objectives were often vague and not written individually for participants 1-7. In some instances the way the objective was written could not be carried out. Specific to the task and consistently across staff. Instructions should walk the staff step by step through the training task. Example: Participant #2's plan has an objective that indicates participant will not interrupt. However the prompt hierarchy includes a full physical prompt. Participant #6 has a bus system program that has several variables and instructions are minimal and do not tell staff how to run the program, terms are utilized that make it difficult to measure

- What corrective action(s) will be taken? Developmental Concepts, Inc. will continue to address these issues as we have taken all of the recommendations of the survey team, put them into place on a mock program and sent it to the team on the same night that it was discussed. Developmental Concepts, Inc. has revised the entire process in which programs are written. The corrective actions are that we have revised all steps within the program and have revised the written instructions to staff with clear and concise steps.
- How will the agency identify participants who may be affected by the deficiency(s). If participants are identified what corrective action will be taken? Developmental Concepts, Inc. has made all necessary changes to the policy so that we are following the recommendations given. These changes include having a more clear understanding of the objectives, rewriting the objectives, interventions etc so that is very individualized and very clear. We are making these changes to all participants programs per their annual

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such as research, determine, appropriate, etc. Observations supported that there were too many variables when instructions were not clear,

plans.

3. Who will be responsible for implementing each corrective action? Administrator and Developmental Concepts, Inc. therapy professionals.
4. How the corrective action(s) will be monitored to ensure consistent compliance with IDAPA Rules? Developmental Concepts, Inc. will continue to address these steps while completing programs.
5. Dates of when the corrective action will be completed? November 2007.

IDAPA 16.04.11.905.03 Method of Informing Participants of Their Rights. c.

The DDA must provide each participant and his parent or guardian, where applicable, with a verbal explanation of their rights in a manner that will best promote individual understanding of these rights. (7-1-06)

FINDINGS: Based upon record review and interview with Administrator, the agency is not in compliance. The findings included:

- 3 of 3 adult participant files reviewed (#5,6,7) did not contain supporting documentation that a verbal explanation of their rights was assured.

1. What corrective action(s) will be taken? Developmental Concepts, Inc. will verbally discuss all rights with the participant and/or legal guardians no matter what the situation is. Developmental Concepts, Inc. has created another form that the participant and or legal guardian will sign that states that the rights have been reviewed with them verbally as well.
2. How will the agency identify participants who may be affected by the deficiency(s). If participants are identified what corrective action will be taken? All of Developmental Concepts, Inc. participants receive a copy of the Rights stating that they have a copy, have read it and understand it but we will again address this with each participant verbally even if that does not promote the best individual understanding. Developmental Concepts, Inc. has implemented the new form and we will ensure that all new participants or legal guardian sign the form after completion as well as we will have the form signed at all annual meetings.
3. Who will be responsible for implementing each corrective action? Administrator and Developmental Concepts, Inc. therapy professionals.
4. How the corrective action(s) will be monitored to ensure consistent compliance with IDAPA Rules? Developmental Concepts, Inc. will ensure that not only will we continue to have the participant or legal guardian sign that they have received a copy, read and understand their rights but additionally they will sign another form that these rights have been verbally discussed with them. Developmental Concepts, Inc. will complete this form at any new intake and at all annual meeting to ensure that it is in place. This will be reviewed throughout the QA process.

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<p>16.04.11.711.DEVELOPMENTAL THERAPY 01. Areas of Service. These services must be directed toward the rehabilitation or habilitation of physical or mental disabilities in the areas of self-care, receptive and expressive language, learning, mobility, self-direction, capacity for independent living, or economic self-sufficiency. (7-1-06)</p> <p>FINDINGS: Based upon record review and interview with staff, the agency is not in compliance. The findings included:</p> <ul style="list-style-type: none"> Participant #5 goes to the gym 2-3 times a week to exercise. As reported by staff they help participant to use the equipment and make sure she exercises. There was not a medical diagnosis to indicate a need although she is over weight. There was no dietary evaluation to determine medical need. The activity was not directed toward any of the areas. 	<p>5. Dates of when the corrective action will be completed? November 2007.</p> <ol style="list-style-type: none"> What corrective action(s) will be taken? It is Participant #5 not #2 and she has been told that she can no longer attend the gym with Developmental Concepts, Inc. during therapy hours as she does not have a need for such usage as per the Rules. How will the agency identify participants who may be affected by the deficiency(s). If participants are identified what corrective action will be taken? Participant #5 will no longer be able to attend the gym during developmental therapy hours. Developmental Concepts, Inc. will review all schedules to ensure that participants are not attending the gym with Developmental Concepts, Inc. during therapy hours. Developmental Concepts, Inc. will assess the desire or need for therapy in this setting and determine at that time if it is a need that is validated by assessments and/or medical need. At that time Developmental Concepts, Inc. will consider providing this service in this environment; otherwise we will explain that this service cannot be provided through developmental therapy. Who will be responsible for implementing each corrective action? Administrator and Developmental Concepts, Inc. therapy professionals. How the corrective action(s) will be monitored to ensure consistent compliance with IDAPA Rules? Developmental Concepts, Inc. will ensure that participants will not attend the gym with Developmental Concepts, Inc. staff during therapy hours with the review of schedules. Dates of when the corrective action will be completed? November 2007.
<p>16.04.11.704.PROGRAM DOCUMENTATION REQUIREMENTS. General Requirements for Program Documentation. For each participant the following program documentation is required: (7-1-06) b. Sufficient progress data to accurately assess the participant's progress toward each objective; and (7-1-06)</p> <p>FINDINGS: Based upon record review and interview with staff, the agency is not in compliance. The findings included:</p> <ul style="list-style-type: none"> In one of the four files reviewed, substantial data was missing to determine progress. There were a number of days when therapy was not provided and there 	<ol style="list-style-type: none"> What corrective action(s) will be taken? Developmental Concepts, Inc. will continue to document reasons if a participant has gaps in services and will also continue to only bill for those hours that services were provided. Developmental Concepts, Inc. will clearly document in the DDR's as to why there are concerns with attendance. We additionally will document more thoroughly when a participant is gone and for what reasons. There was not data missing as services were not provided. How will the agency identify participants who may be affected by the deficiency(s). If participants are identified

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was no documentation available to justify the gaps in therapy.

what corrective action will be taken? The one participant that this is regarding has not been affected by this as it was his and his family's choice to not have services for the variety of reasons that were explained in Developmental Concepts, Inc. documentation. We will continue to document reasons why a participant may not be present for therapy and therefore not bill or have data for that time.

3. Who will be responsible for implementing each corrective action? Administrator and Developmental Concepts, Inc. therapy professionals.
4. How the corrective action(s) will be monitored to ensure consistent compliance with IDAPA Rules? Developmental Concepts, Inc. will continue to ensure that we are documenting all reasons why therapy did not occur and bill according to the hours provided. This will be completed through the DDR's completed by the professionals. Developmental Concepts, Inc. will review the attendance records to determine if the level of service is needed.
5. Dates of when the corrective action will be completed? November 2007.

Survey report completed by: Rebecca Fadness

Date: 9/28/2007

Agency Administrator Signature: *Heather Walen*

Date: 10-31-07

Plan of correction accepted: *Rebecca Fadness*

Date: 11/1/07